

September 23, 1996

Office of the Departmental Representative to the Defense
Nuclear Facilities Safety Board: S-3.1: 6-3887

DISTRIBUTION OF CROSSWALKS

Marcia Morris, Director, Office of Organizations and Management
(HR-6)

This letter transmits completed crosswalks ready for distribution to affected Departmental Elements. In your distribution and posting of these crosswalks on the Explorer System, inclusion of this memorandum is recommended to clarify their development and intended use.

The attached crosswalks are provided to map the requirements for the source documents (i.e. old DOE Orders) of the 5 new Orders which were identified by the Board with crosswalk deficiencies in their June 6, 1996 letter. The Board has determined that the requirements from the 51 safety Orders of interest to the Board have been successfully mapped to the new Orders and proposed Nuclear Safety Rules.

The purpose of the crosswalks is to allow the Department, and particularly the field managers, to track the fate or disposition of safety requirements contained in the old Orders. This will provide the field with a tool to conduct efficient compliance assessments, as appropriate, and to evaluate the applicability of the new Orders. The crosswalks are not all constructed alike; however, they have all been developed using the following crosswalk acceptance criteria:

1. Each and every requirement contained in the Orders must be tracked to ground. This has required a line by line (requirement by requirement) review of the Orders.
2. Every old requirement must be either continued as a new requirement, changed into guidance, deleted, or

modified and then continued as a requirement or changed to guidance.

3. The location of the old requirement and new requirement or guidance must be specifically indicated by section number or paragraph number.
4. The crosswalk must be completed to the most current version of the Rule or Order.
5. The crosswalk is an administrative or accounting tool in nature and does not need to provide justification or basis for action taken.

The following crosswalks were found acceptable by the Board and this completes the crosswalks mapping for the requirements from the old Orders to the new Orders:

- a) Source documents for DOE Order 460.1, Packaging and Transportation Safety
 - DOE Order 1540.2, Hazardous Material Packaging for Transport - Administrative Procedures
 - DOE Order 5480.3, Safety Requirements for Packaging and Transportation of Hazardous Materials, Hazardous Substances, and Hazardous Wastes
- b) Source documents for DOE Order 460.2, Departmental Materials Transportation and Packaging Management
 - DOE Order 1540.1A, Materials Transportation and Traffic Management
 - DOE Order 1540.2, Hazardous Material Packaging for Transport - Administrative Procedures
 - DOE Order 1540.3A, Base Technology for Radioactive Material Transportation Packaging System
- c) Source document for DOE Order 210.1, Performance Indicators and Analysis of Operations Information
 - DOE Order 5480.26, Trending and Analysis of Operations Information Using Performance

Indicators

- d) Source documents for DOE Order 420.1, Facility Safety
 - DOE Order 5480.4, Environmental Protection, Safety and Health Protection Standards
 - DOE Order 5480.24, Nuclear Criticality Safety
 - DOE Order 5480.28, Natural Phenomena Hazards Mitigation
 - DOE Order 5480.7A, Fire Protection
- e) Source document for DOE Order 225.1, Accident Investigation
 - DOE Order 5484.1, Environmental Protection, Safety and Health Protection Information Reporting Requirements

Each crosswalk designates a revision number and/or date of the Order being mapped which provides the configuration control to ensure proper use of the crosswalks in the field.

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to the Defense Nuclear
Facilities Safety Board